

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

HILTON LLOYD KELLER, #B33552,

Plaintiff,

vs.

BRAD THOMAS, #15019, et al.,

Defendants.

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No. 10-676-GPM-DGW

DEFENDANTS' MOTION TO EXTEND THE DISPOSITIVE MOTION DEADLINE

NOW COME the Defendants, THOMAS DRAKE, ANTHONY LOCHHEAD, MATTHEW PURDOM, and SHANE SULSER, by and through their attorney, Lisa Madigan, Attorney General for the State of Illinois, and move to extend the dispositive motion deadline for the following reasons:

1. On October 21, 2011, this Court entered an amended scheduling and discovery order which provided that discovery was to end on March 22, 2012, and the dispositive motion deadline was set for April 23, 2012. [Court doc. 55].
2. The parties completed written discovery before discovery closed but were unable to complete depositions prior to that time.
3. The parties agreed to hold depositions outside of the discovery time-frame and last week the parties set dates and times for the depositions.
4. Accordingly, Defendants seek to stay the dispositive motion deadline until the depositions are complete and the transcripts are returned to the parties.
5. The parties have discussed this issue and have agreed to request an extension of the dispositive motion deadline up to and including June 4, 2012.

6. This request is not made for purposes of undue delay and should not interfere with the trial currently scheduled for August 6, 2012.

WHEREFORE, Defendants respectfully request that this Court grant Defendants' request for an extension of the dispositive motion deadline up to and including June 4, 2012.

Respectfully submitted,

THOMAS DRAKE, ANTHONY
LOCHHEAD, MATTHEW PURDOM, and
SHANE SULSER,

Defendants,

LISA MADIGAN, Attorney General,
State of Illinois

Attorney for Defendants,

Lisa Cook, #6298233
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62706
(217) 782-9026

Of Counsel.

By: /s/ Lisa Cook
LISA COOK
Assistant Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2012, the foregoing document, Defendants' Motion to Extend the Dispositive Motion Deadline, was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Matthew S. Bober
mbober@thompsoncoburn.com

and I hereby certify that on April 23, 2012, a copy of the foregoing document was mailed by United States Postal Service, to the following non-registered participant:

None

Respectfully Submitted,

s/ Lisa Cook
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